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12 HOSPITALITY HOUSE, COALITION ON
13 HOMELESSNESS, and FAITHFUL FOOLS

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 COLLEGE OF THE LAW, SAN FRANCISCO, a
17 public trust and institution of higher education duly
18 organized under the laws and the Constitution of the
19 State of California; FALLON VICTORIA, an
20 individual; RENE DENIS, an individual;
21 TENDERLOIN MERCHANTS AND PROPERTY
22 ASSOCIATION, a business association; RANDY
23 HUGHES, an individual; and KRISTEN
24 VILLALOBOS, an individual,

21 Plaintiffs,

22 v.

23 CITY AND COUNTY OF SAN FRANCISCO, a
24 municipal entity,

25 Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF JOSEPH
T. WILSON IN SUPPORT OF
INTERVENORS' OPOSITION
TO PLAINTIFFS' MOTION
TO ENFORCE STIPULATED
INJUNCTION**

**ASSIGNED FOR ALL
PURPOSES TO THE
HONORABLE JON S. TIGAR,
COURTROOM 6**

Date: 05/23/2024

Time: 2:00 p.m.

Action Filed: 05/04/2020
TRIAL DATE: (TBD)

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(Counsel for Intervenors continued from previous page)

1 I, Joseph T. Wilson, declare:

2 1. I am the Executive Director of Hospitality House, a non-profit organization, and
3 an Intervenor in *Hastings College of the Law, et al. v. City & County of San Francisco*: Case
4 No.: 4:20-cv-03033-JST. I make this Declaration in support of Intervenor's Opposition to
5 Plaintiffs' Motion to Enforce the Stipulated Injunction.

6 2. The facts set forth below are known to me personally. I have first-hand
7 knowledge of these facts. If called as a witness, I could and would testify competently, under
8 oath, to such facts.

9 3. Hospitality House, located in San Francisco's Tenderloin Neighborhood, Sixth
10 Street Corridor, and Mid-Market area, has a mission to build community strength by advocating
11 for policies and rendering services which foster self-sufficiency and cultural enrichment.

12 4. Through six diverse programs: Community Arts Program, Community Building
13 Program, Employment Program, Shelter Program, Sixth Street Self-Help Center, and Tenderloin
14 Self-Help Center, we serve thousands of San Franciscans, including the unhoused, many who
15 have disabilities, and other low-income individuals. Hospitality House takes a trauma-informed
16 approach to its services that ensure unhoused individuals are not further harmed and reduces
17 obstacles to help them become rehoused.

18 5. The University of California College of the Law filing seems to solely focus on
19 bringing the number of homeless encampments and tents in the Tenderloin neighborhood to zero.
20 In the motion to enforce the injunction, there is no concern for the rights of the unhoused
21 community or mention of the City's obligation to provide services and housing. The root of the
22 problem, which is not addressed in the filing, is the lack of services and housing for the
23 Tenderloin community, not the number of tents.

24 6. Based on our experience working in the community, even if there has been a
25 marginal increase of tents on the streets, it is related to the loss of the Shelter in Place hotel
26 program, which helped many become permanently housed, and the ongoing need for more
27 affordable, accessible housing options.

28 7. There are far more unhoused people living in the City (including the Tenderloin)

1 than there are available shelter beds. My understanding is that the City has a waitlist for shelters.
2 In addition, contrary to the perception that unhoused people choose to stay unhoused, it has been
3 our experience at Hospitality House that people will accept offers of a shelter bed when they are
4 made available and accessible.

5 8. Hospitality House used its own funding to initially operate a Shelter in Place
6 program and, with City support, moved nearly ninety percent of our residents into permanent
7 supportive housing, with some moving into market-rate housing. The City also provided Shelter
8 In Place hotel rooms to people during the pandemic, in part to comply with the Stipulated
9 Injunction.

10 9. During the process of placing residents in more permanent housing, we prioritized
11 placing them in a cohort to preserve the community that had been built when they lived on the
12 streets, in addition to wraparound services. For example, we placed a cohort of twenty people
13 into permanent supportive housing. We have learned over the years the importance of allowing
14 community to follow people where they land, including in shelter settings.

15 10. The University proposes pushing people out of the Tenderloin district and into
16 other areas like the beaches and plazas where there is little to no support. This only deepens the
17 problem by cutting people off from their community support, makes it harder for individuals to
18 access services, and makes connecting these individuals with housing more difficult.

19 11. In our experience, the lack or loss of community can perpetuate separation and
20 deepens poverty and homelessness. When Hospitality House placed people in cohorts, it allowed
21 them the space and time to take their necessary belongings like medication, clothing, and
22 important documents, to build and transition their lives from the street to hotels, and ultimately,
23 to permanent housing.

24 12. The enforcement of this Injunction and a zero-tent policy runs counter to
25 preserving community, addressing needs of those experiencing homelessness and ending
26 homelessness. At Hospitality House, we recognize that society is a communal experience, and
27 the community helps us arrive at long-term solutions for poverty and homelessness.

28 13. With the City's current policy of a short notice followed by sweeps, it is in direct

1 opposition to the trauma-informed approach that reduces harm and obstacles to help people
2 become rehoused. When the City clears tents, we see an increase in the number of individuals
3 needing more services, not less. When you use a humane approach with supportive services, like
4 Hospitality House, this can reduce the obstacles for people to access community and housing.

5 14. Clearing tents may make it easier for the City, business leaders, and
6 policymakers to ignore the reality on the street. Removing tents simply erases the visual
7 evidence that we do not have enough affordable housing but does not address the greater need
8 and the harm of removal of tents for people who have nowhere to go.

9 15. This issue is not new; it takes planning and long-term planning to address the
10 needs of homelessness. It is further disheartening to witness our public institutions, like the
11 University of California College of Law, San Francisco, which holds itself out as “cultivating a
12 diverse, equitable and inclusive community,” as stated on their website, acting against the very
13 community it teaches in. Instead of promoting their own private interests over that of the
14 public’s, the University should be involved in identifying permanent solutions to this housing
15 crisis.

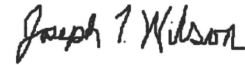
16 16. The focus should be on sustainable solutions rather than short-term enforcement
17 approaches that are ineffective. These approaches fail to address the needs of the most vulnerable
18 individuals who have borne the brunt of the City’s inadequate homeless system and the lack of
19 accessible, affordable housing.

20 17. Equating every solution with law enforcement response is backwards and does
21 not create long term solutions. There are broader definitions for public safety than enforcement
22 such as housing, health care, and employment. We have the capacity to build community centers,
23 childcare facilities, libraries, etc. in communities and that is public safety and investing in the
24 public interest. This approach also allows people to be in communal spaces in their own
25 community.

26 18. Based on my past experiences, the University’s efforts to demand enforcement of
27 the Injunction will likely lead to more police involvement and sweeps and cause more harm
28 instead of approaching the needs of the unhoused with providing wrap around services like

1 Hospitality House's tried and true services.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge. Executed on April 17, 2024, San
4 Francisco, California.

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8 Joseph T. Wilson

9 *Executive Director, Hospitality House*